

From: Bertram, Gary
To: Smith, Mark A.
Cc: Werner, Leslye; HertzWu, Sara
Subject: RE: Bridgeton
Date: Monday, March 25, 2013 4:54:51 PM

Boss – Regarding your second question. I read through the rule. Checked the ADI. Searched preambles. I didn't find much. Basically, the landfill is required to prepare an SSM Plan and follow it in the event of an SSM event. I was trying to find examples or discussions regarding anticipated SSM events at landfills. However, much of what I found simply referred to the Part 63 General Provisions.

I'm not sure of the procedures they are following to install the new wells or "rebuild" the gas collection system. Perhaps I should track down a copy of their SSM Plan and see what's in it. I'll check our files in the Records Center tomorrow morning.

Take Care,

Gary Bertram
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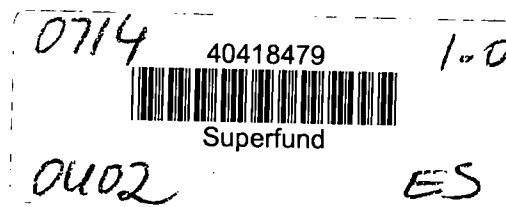
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From: Smith, Mark A.
Sent: Monday, March 25, 2013 10:10 AM
To: Bertram, Gary
Cc: Werner, Leslye; HertzWu, Sara
Subject: Bridgeton

Gary - can you do some research in prep for tomorrow's briefing about how the recent landfill construction activities affect Bridgeton and NSPS? For example, would it constitute a "reconstruction" under NSPS triggering additional requirements, such as seeking "re-approval" of their landfill design?

Or, how does the construction of additional wells and such affect compliance with gas collection and methane levels...is it considered an SSM if they have gas emission spikes during this construction period?

Thanks!



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